

United States Courts  
Southern District of Texas  
FILED

JUN 4 2010

Clerk of Court

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

BERTHA M. TORRES

Plaintiff,

Vs.

UNITED STATES OF AMERICA,  
UNITED STATES IMMIGRATION &  
CUSTOMS ENFORCEMENT  
Defendants

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§  
§  
§

CIVIL ACTION NO. 4:10 cv-01636

BERTHA M. FLORE'S CONSOLIDATED MOTION FOR CONVENTIONAL  
PAPER FILINGS

NOW COMES BERTHA M. TORRES also known by her maiden name BERTHA FLORES-SALDANA (herein further referred as "Plaintiff") through her counsel of record CHUKWU U. OKO and hereby files this Consolidated Motion for Conventional Paper Filings and would show in support as thus:

The undersigned avers that his law office is under the process of setting up electronic filings of all legal instruments in compliance with the local rules of this court. The undersigned has full intentions to comply with the local rules to electronically file of all instruments in the future. However, until, he is fully capable of doing electronically filings in this Court. Attorney Oko asks this Court to allow him to do conventional paper filings until his law office is capable of doing instruments filings electronically. Specifically, plaintiffs wish to file the following instruments:

- i. Bertha M. Torres's Verified Claim for Forfeiture in Rem;
- ii. Defendant Bertha M. Torres's Response to Verified Complaint for Forfeiture in Rem;

and,

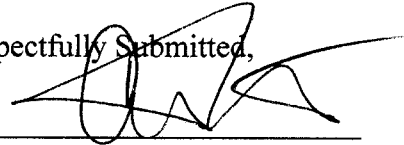
iii. Defendant's Bertha M. Torres Disclosure of Interested Parties.

The undersigned counsel avers that this motions is not filed to cause delay but for the interest of Justice. Specifically, considering the large amount of money in Rem, the undersigned counsel finds it necessary to proceed with conventional paper filings because of his clients' financial situation before his law office is fully capable of electronic filling.

**II.  
PRAYER**

11. **WHEREFORE PREMISES CONSIDERED**, the undersigned counsel prays that she is allowed to file by conventional paper filings.

Respectfully Submitted,



Chukwu U. Oko, Esquire  
TBN: 24007771, SDTX: 23625  
OKO & ASSOCIATES LAW FIRM  
7324 SW Freeway, Suite 202  
Houston, Texas 77074  
Tel: (713) 773-4887  
Fax: (281) 573-0766  
E-mail: [okolawpc@hotmail.com](mailto:okolawpc@hotmail.com)

ATTORNEY FOR BERTHA M. TORRES

**CERTIFICATE OF SERVICE**

I, MARIBEL MOLINA, hereby certify that I have mailed a true copy of the above and foregoing Documents to the following address of U.S. Attorney's office to the opposing counsel by e-mail and facsimile on 3rd this day of JUNE, 2010 as to the local rules.

  
MARIBEL MOLINA

Assistant U.S. Attorney  
Albert Ratliff, Attorney-in-Charge  
P.O. Box 61129  
Houston, Texas 77208  
E-mail: [albert.ratliff@usdoj.gov](mailto:albert.ratliff@usdoj.gov)  
Office: 713-567-9579  
Fax: 713-718-3300